



Nebraska Public Power District

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DEC 26 2013

APCO

December 20, 2013

Shelley Schneider
Air Division Administrator
Nebraska Department of Environmental Quality
P.O. Box 98922
Lincoln, NE 68509-8922

Re: GGS MATS Compliance Date Extension Request Form
Facility ID # 34385

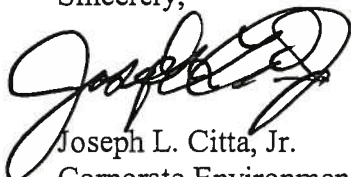
Dear Ms. Schneider:

Enclosed is a request for a 1-year extension of the compliance date for the Mercury and Air Toxics Standard (MATS) rule. The enclosed compliance extension request form provides the basis for this request. Nebraska Public Power District (NPPD) is requesting written approval from the NDEQ to extend the MATS compliance date for Gerald Gentleman Station one (1) year until April 16, 2016.

The MATS rule general provisions found at 40 CFR 63.6(i) provides a mechanism for facilities to obtain a one-year extension of the compliance date from the state permitting authority. The preamble to the final MATS rule indicates that the EPA believes that the flexibility of permitting authorities to allow a fourth year for compliance should be available in a broad range of situations and the EPA MATS rule fact sheet indicates that they expect the option to provide a one-year extension to be broadly available.

If there are any questions please give me a call at (402) 563-5355.

Sincerely,



Joseph L. Citta, Jr.
Corporate Environmental Manager

Enclosure

Cc: Todd Ellis, NDEQ
Angela Catalano, EPA Region VII

General Office

1414 15th Street / PO Box 499 / Columbus, NE 68602-0499

Telephone: (402) 564-8561 / **Fax:** (402) 563-5527

www.nppd.com



NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division

COMPLIANCE EXTENSION REQUEST

Applicable Rule: 40 CFR Part 63, Subpart A - National Emission Standards for Hazardous Air Pollutants (NESHAP) – General Provisions

*This form fulfills the requirements necessary to request an extension of compliance under 112(d) of the Clean Air Act (CAA) as specified in §63.6(i) and §63.9(c) of the Code of Federal Regulations (CFR). The deadline by which a request for an extension of compliance with a relevant standard must be received is **no later than 120 days before the compliance date of the standard*** [as specified in §63.6(b) and (c)]. The amount of time requested for the extension request cannot exceed one (1) year.*

**Please note that emissions standards established under this part may specify an alternative date (e.g., other than 120 days) for the submittal of requests for an extension of compliance if alternatives are appropriate for the source categories affected by those standards. Please check the relevant standard for alternative submittal dates (§63.6(i)(4)(i)(B)).*

Company Name: NPPD-Gerald Gentleman Station

Facility ID#: 34385

Owner/Operator/Title: Nebraska Public Power District

Mailing Address: 1414 15th Street

City: Columbus

Zip: 68601

Plant Address (if different than owner/operator's mailing address):

Street: 6089 South Highway 25

City: Sutherland

Zip: 69165

Plant Phone Number: 402-563-5355

Plant Contact/Title: Joe L. Citta, Jr. / Corporate Environmental Manager

This form must be completed, signed and submitted to NDEQ or the appropriate air pollution control agency no later than 120 days prior to the compliance date of the standard.

NDEQ Air Quality Division
1200 'N' St. Atrium, Suite 400
Lincoln, NE 68509-8922

If your facility is located in Omaha or Lancaster County, you must submit a notification to the appropriate local air pollution control agency in that area and Region VII EPA.

1. What is the relevant standard from which you are requesting a compliance extension (e.g., NESHAP Subpart ZZZZ for Reciprocating Internal Combustion Engines, etc.)?
40 CFR Part 63 Subpart UUUUU - Mercury and Air Toxics Standard

Compliance Date of the Relevant Standard (mm/dd/yyyy): 04/16/2015

2. Identify the reasons why additional time is needed to comply with the standard:
Installation and testing of compliance equipment, coupled with outage schedules, is such that the work cannot be completed prior to April 2015.

Provide the date (mm/dd/yyyy) when you first learned of the issues which led to this compliance extension request (§63.6(i)(4)(i)(C)): 12/02/2013

3. What controls are being installed at your facility to ensure compliance with the relevant standard (§63.6(i)(6)(i)(A))?
- Installation and tuning of activated carbon injection (ACI) systems for control of mercury emissions.
 - Installation and certification of a sorbent trap system for mercury monitoring.
 - Installation, testing and evaluation of combustion optimization, equipment, hardware & software.
 - Potential installation of particulate matter CEMS.
4. Provide a compliance schedule by identifying which of the following activities will be initiated and/or completed and the expected dates of completion **as a part of the process of achieving compliance with the applicable standard** (§63.6(i)(6)(i)(B)(1)-(2)):

| Activities | Part of your compliance process | Expected date of completion (mm/dd/yyyy) | Comments (Optional) |
|--|--|--|---|
| On-site construction | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | 06/15/2015 | ACI, monitoring and combustion optimization systems |
| Installation of emission control equipment | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | 06/15/2015 | ACI, monitoring and combustion optimization systems |
| Process change | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | 12/15/2015 | Tuning and testing to complete the ACI, monitoring and combustion optimization projects |

5. Specify the date (mm/dd/yyyy) by which final compliance with the applicable standard is to be achieved (§63.6(i)(6)(i)(B)(2)): 04/16/2016
6. Has your facility been issued an Air Quality Operating Permit? Yes ☒ No ☐
- If yes, what type of permit were you issued and what was the most recent date of issuance?

| | | |
|----------------------------|--|---|
| Class I Operating Permit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | If yes, date issued (mm/dd/yyyy)? 04/03/2012 |
| Class II Operating Permit? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | If yes, date issued (mm/dd/yyyy)? ____/____/____ |

Source Classification - Check the boxes that apply:

☒ Facility is a major source of hazardous air pollutants (HAPs).*

☐ Facility is an area source of HAPs.*

**Note: A major source is a facility that has a potential to emit greater than 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line.*

☒ Affected unit/source is classified as an existing source under the relevant standard.**

☐ Affected unit/source is classified as a new source under the relevant standard.**

***Note: To determine if your unit/source is new or existing, please consult the relevant standard or contact the NDEQ.*

Certification

Print or type the name and title of the Responsible Official* for the facility:

Name: Thomas J. Kent

Title: V.P. & Chief Operating Officer

I CERTIFY THAT INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

By signing this form, I am providing official notification that I am unable to comply with the relevant standard and require additional time for the reasons specified in this form (§63.6(i)(4)(i)(A)).


(Signature of Responsible Official)

12/20/2013
(Date)

*A Responsible Official can be:

- The president, vice president, secretary, or treasurer of the company that owns the plant;
- An owner of the plant;
- A plant engineer or supervisor of the plant;
- A government official, if the plant is owned by the Federal, State, City, or County government; or
- A ranking military officer, if the plant is located at a military base.